



State of Utah

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October 14, 2004

Mr. Russell A. Hinds, President
The Hinds Group, LP
Energy and Environmental Professionals
7660 Woodway, Suite 300
Houston, Texas, 77063

Subject: Scope of Work for Voluntary Groundwater Investigation
Waste Asphalt Pits, Crown Asphalt Ridge, LLC, Vernal, Utah

The Division of Water Quality (DWQ) has completed a review of the proposed Scope of Work for the subject site, which we received on September 30, 2004. In general, the proposed Scope of Work is acceptable for meeting the site characterization objectives in the vicinity of the waste asphalt pits. Our comments regarding the subject Scope of Work are provided below.

1. Although, the proposed Scope of Work is acceptable for meeting the site characterization objectives, some clarification is needed regarding the disposal of the processed waste asphalt. Please provide the procedures that you will follow to remove and properly dispose of the processed waste asphalt.
2. In addition to the potentiometric surface map showing the ground water gradient and flow direction, please include a facility site map in the report with a scale and north arrow, which shows the locations of the waste asphalt pits, buildings, utility lines, water wells, surface water bodies, facility property boundaries, temporary and permanent ground water monitoring wells.
3. Because the objective of the subsurface investigation is to characterize soil and ground water conditions at the site, continuous soil coring should be conducted from the ground surface to the total depth of the borehole, and soils should be described in detail and recorded on boring logs according to the Unified Soil Classification System.

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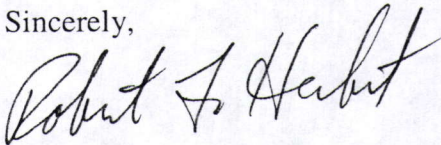
DIV OF OIL GAS & MINING

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4. The Administrative Rules for Ground Water Quality Protection (R317-6) define background as follows: *"Background Concentration" means the concentration of a pollutant in ground water upgradient or lateral hydraulically equivalent point from a facility, practice, or activity which has not been affected by that facility, practice, or activity.* Please consider this definition carefully when locating your background monitoring well.
5. Cleanup standards for any contaminant concentrations not attributed to natural background conditions associated with the native tar sand deposits should be based on the Risk-Based Corrective Action (RBCA) Tier 1 screening levels, as applicable (attached).

We appreciate the proactive effort of the Hinds Group and Crown Asphalt Ridge in conducting this voluntary subsurface investigation for the subject site. If you have any questions or comments, please contact me at 801-538-6038.

Sincerely,



Rob Herbert, Manager
Ground Water Protection Section

Cc: Paul Baker, DOGM